

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff	)	CR. No. 05-10052-RCL
	)	
v.	)	
	)	
JEREL LESLIE	)	
	)	
Defendant	)	
_____	)	

**MOTION FOR APPROVAL OF EXPENDITURE OF FUNDS**  
**FOR TRANSCRIPT OF STATE COURT PROCEEDING**

Now comes the Defendant in the above captioned matter by and through his attorney and requests this Honorable Court to approve the expenditure of funds for a transcript of the state suppression hearing.

In support hereof, the Defendant submits the following:

This indictment charges the Defendant with 18 U.S.C. Sec. 922(g)(1); Possession of a Firearm and Ammunition by a Felon. It is anticipated that, if convicted the government will be seeking a substantial term of imprisonment (in excess of 15 years) for the Defendant under the guidelines and the applicable mandatory sentencing provisions. Since the Defendant is approximately 24 years old, if convicted he will most likely spend a substantial part of his adulthood in prison. He has entered a plea of not guilty and intends to put the government to its proof.

The evidence against the Defendant consists in part of the testimony of a police officer who stopped the vehicle in which the Defendant was a passenger.

There has already been a suppression hearing in state court in connection with this matter. That hearing was recorded on four-track tape by the state Court. In that hearing the police officer referenced above along with other witnesses provided conflicting testimony with

regard to the initial stop of the vehicle. In its Memorandum in Support of its Motion To Suppress the Defendant makes several references to the state suppression hearing testimony. A transcript of the state suppression hearing would assist the Court and the parties in determining the exact testimony of the witnesses.

The Defendant would request that an expenditure of amount not to exceed \$1,000 be authorized for the employment of a stenographer to transcribe the state suppression hearing tapes.

**JEREL LESLIE**

By his attorney,

/s/ ***Albert F. Cullen, Jr.***

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Dated: September 21, 2005

I, Albert F. Cullen, certify that I understand that all counsel will receive electronic notice of the electronic filing of this pleading.

/s/ **Albert F. Cullen, Jr.**

Albert F. Cullen, Jr.